CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 89-83

WASTE DISCHARGE REQUIREMENTS FOR:

PACIFIC RACING ASSOCIATION,
LADBROKE RACING CALIFORNIA INC. AND
SANTA FE PACIFIC REALTY CORPORATION
GOLDEN GATE FIELDS
ALBANY, ALIMADA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter called the Board) finds that:

1. The Pacific Racing Association, known as "Pacific", is the current operator of the Golden Gate Fields (GGF). The current legal tenant of the property is Ladbroke Racing Corporation and has subleased the GGF to Pacific in 1988. The GGF race track is on land presently owned by the Santa Fe Pacific Realty Corporation. These three entities are hereinafter referred to as the discharger. The Santa Fe Pacific Realty Corporation is responsible for compliance with this order only in the event that Pacific and Ladbroke Racing California Inc. fail to comply with this order in a timely manner. Pacific and Santa Fe Pacific Realty Corporation have informed the Board that Ladbroke Racing Corporation is the parent cooperation of the Ladbroke Racing California Inc. and Pacific Racing Association. The Board reserves jurisdiction to name Ladbroke Racing Corporation as a discharger in this matter.

2. Pacific Racing Association a Report of Waste Discharge dated December 19, 1988.

3. GGF stables about 1,500 horses during the racing season (January through July) and 400 to 750 horses for the remainder of the year. The stables at GGF occupy approximately 30 acres at the southern end of the racetrack property, just south of the Albany/Berkeley city boundary. Wastewater from horse washing, stable wash-down and stormwater is collected and conveyed to catch basins connected to a network of underground storm drains. These drains discharge through six outfalls to San Francisco Bay and through two outfalls to Cordonices Creek.

4. Manure and soiled straw are hauled away daily, and stables are swept to minimize wastewater generation. Two wastes are currently discharged to San Francisco Bay: (1) wastewater from horse

washing activities (about 30,000 gallons per day, year-round), and (2) runoff from the stables area during the rainy season. Both wastes have been shown to contain high levels of coliform bacteria, in excess of water quality objectives for swimming and shellfishing outlined in the Regional Board's Basin Plan.

5. In November 1987, the Regional Board's staff requested that GGF conduct a feasibility study to determine possible wastewater treatment alternatives to cease any further discharge of wastewater into the Bay.

6. On December 20, 1988, Pacific submitted a revised concept plan for the GGF stable area drainage collection and disposal system. The proposed system consists of a drainage interception system which would collect the wastewater from the thirty acres of barn and paved ground areas. The wastewater would drain into a pump station, pass through a filter screen to remove debris, and then be pumped to a three million gallon aeration/equalization pond to be located in the infield area of the track. The drainage water will be treated in the aeration pond by biological oxidation and then stored in three reclamation ponds for the purpose of infield irrigation and track compaction requirements. Excess flow would be diverted into the EBMUD interceptor sewer in Albany during off-peak flow periods when that excess could be accepted. The reclaimed water will be chlorinated to meet applicable California Title 22 requirements . Furthermore, the conceptual plan also recommends additional measures to prevent vector and odor problems, and to restrict public access to the aeration/treatment pond area.

7. All of the ponds described in finding #6 do not constitiute waters of the State or of the United States (as defined in the Clean Water Act and the Porter-Cologne Act or their equivalents in the future) nor will the use of the ponds by the discharger in the manner described cause those (and areas to become waters of the State or of the United States. It is the property owner intention that the ponds described in Finding #6 will be filled to the surrounding grade when the property is no longer used for the purpose of stabling of animals or the purpose to horse racing.

8. Based on the latest engineering study, the proposed wastewater reclamation project will conserve an annual average of 27.5 million gallons of potable water. Since GGF presently purchases approximately 47 million gallons of freshwater annually from EBMUD for their irrigation and track compaction needs, the plan represents a 56% reduction. Moreover, the proposed work plan will lead to zero discharge of wastewater into the bay from horse washing activities and storm runoff.

9. The Board adopted a revised Water Quality Control Plan for the Francisco bay basin (Basin Plan) on December 17, 1986. The beneficial uses of Central Bay and contiguous water bodies are:

    Industrial Service Supply
    Industrial Process Supply
    Navigation
    Water Contact Recreation
    Non-Contact Water Recreation
    Ocean Commercial and Sport Fishing
    Wildlife Habitat
    Preservation of Rare and Endangered Species
    Fish Migration
    Fish Spawning
    Shellfish Harvesting
    Estuarine Habitat

10. Section 13523 of the California Water Code provides that a Regional Board, after consultation with and reception of recommendations from the State Department of Health Services, and if it determines such action to be necessary to protect the public health, safety, or welfare, shall prescribe water reclamation requirements for water which is used or proposed to be used as reclaimed water.

11. These water reclamation requirements are in conformance with the statewide reclamation criteria established by the State Department of Health Services as prescribed in Title 22, Section 60301 through Section 60355, California Administrative Code.

12. The issuance of waste reclamation requirements is exempt from the provisions of Chapter 3 (commencing with Section 21000 of Division 13) of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.

13. The discharger and interested agencies and persons have been notified of the Board's intent to precribe waste discharge requirements and have been provided with the opportunity for a public hearing and opportunity to submit their written views and recommendations. The Cities of Albany and Berkeley have reviewed this project and have commented on it. The City of Albany which is lead agency for CEQA purposes, had developed an initial Study and expects to issue a Negative Declaration for the purposed reclamation project.

14. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that the Discharger, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder:

A. Prohibitions

1. The use of reclaimed water shall not cause degradation of groundwater suitable for domestic use or cause an increase in any quality parameter that would make groundwater unsuitable for irrigation use.

2. The treatment, re-use, or distribution of reclaimed wastewater shall not created a nuisance as defined in Section 13050(m) of the California Code.

3.* No waste or reclaimed water shall be allowed to escape from the discharger's property into waters of the State via surface flow, airborne spray or surfacing after percolation.

4. Reclaimed water shall not be used domestic or animal water supply.

5.* Bypass or overflow of untreated or partially treated wastewater to waters of the State either at the treatment plant or from any of the collection or transport system is prohibited.

* This Prohibition is not applicable to the both of following upset conditions:

1) Backup and surcharge of the wastewater colection system in the event of a storm intensity greater than a 10 year recurrence interval;

2) Backup and surcharge of the wastewater collection, treatment or storage system as a result of a succession of rain storms which fill the holding capacity, when, at the same time, East Bay Municipal utility District is unable to accept such overflows from the discharger.

B. Specifications

1. The reclaimed water shall be at all times an adequately disinfected, oxidized water and shall meet the following quality limits at all times:

5-day BOD	40.0 mg/l, maximum
pH	9.0 maximum and 6.0 minimum
Dissolved Oxygen	2.0 mg/l, minimum
Dissolved Sulfide	0.1 mg/l, maximum
Coliform Organisms	Median MPN shall not exceed 23 coliform organisms per 100 milliters of sample at

some point in the treatment process. The median value will be determined from the bacteriological results of the last seven (7) analyses. Maximum shall not exceed 240 MPN/100 ml for any 2 consecutive samples.

2. All aboveground equipment, including pumps, piping and valves, etc., which may at any time contain waste shall be adequately and clearly identified with warning signs. The discharger shall inform the public that the liquid contained in reclamationequipment and storage ponds is sewage and is unfit for human consumption.

3. The use of reclaimed water for irrigation and race track compaction shall cease immediately when any of the above specifications or prohibitions are not in compliance.

4. A minimum freeboard of a least two feet shall be maintained inthe aeration/equalization pond and that pond shall have the capacity to store the quantity of water generated by a 25 year, 24 hours storm event. The reclamation ponds shall have a combined capacity of approximately four (4) million gallons, in order to contain that quantity of reclaimed water generated from the wet weather season when irrigation is not needed.

5. The discharger shall manage its spray irrigation so as to prevent the breeding of insects and other vectors of health significance, and the creation of odors, slimes, or unsightly deposits.

C. Provisions

1. The discharger shall implement a Self-Monitoring Program as specified by the Regional Board and as may be revised by the Executive Officer.

2. The discharger shall meet the following schedules:

	Item	Date
a.	Submit a detailed construction plan and schedule for the proposed wastewater reclamation project.	July 1, 1989
b.	Complete Project Construction and begin operating the project	November 1, 1989
c.	Submit a detailed operating and maintenance manual.	December 15, 1989

3. At least thirty (30) days prior to the initial use of reclaimed wastewater, the discharger shall submit a report, satisfactory to the Executive Officer, describing the irrigation system design and operation to minimize any public contact with reclaimed water and to prevent possible cross connections to potable water supply systems. The Executive Officer shall consider the comments of the Alameda County Office of Environmental Health.

4. The Santa Fe Pacific Realty Corporation is responsible for compliance with this order only in the event that Pacific and Ladbroke Racing California Inc. fail to comply within 120 days of the dates set forth in said provisions.

5. Upon reasonable notice the discharger shall permit the Regional Board or its authorized representative:

   a. Entry upon premises in which an effluent source is located or in which any required records are kept.

   b. Access to copy any records required to be kept under terms and conditions of this Order.

   c. Inspection of any monitoring equipment or method required by this Order.

   d. Sampling of pond water.

6. The discharger shall maintain in good working order and operate as efficiently as possible any facility or control system installed by the user to achieve compliance with the water reclamation requirements.

7. In the event of any change in control or ownership of land or water reclamation facilities presently owned or controlled by the discharger, the discharger shall notify the succeeding owner or operator of the existence of this Order by a letter, a copy of which shall be forwarded to this Board.

8. The discharger shall file with the Regional Board a report on waste discharge at least one-hundred & eighty (180) days before making any material change or proposed change in the character, location, or volume of reuse, except for emergency conditions in which case the Board shall be notified.

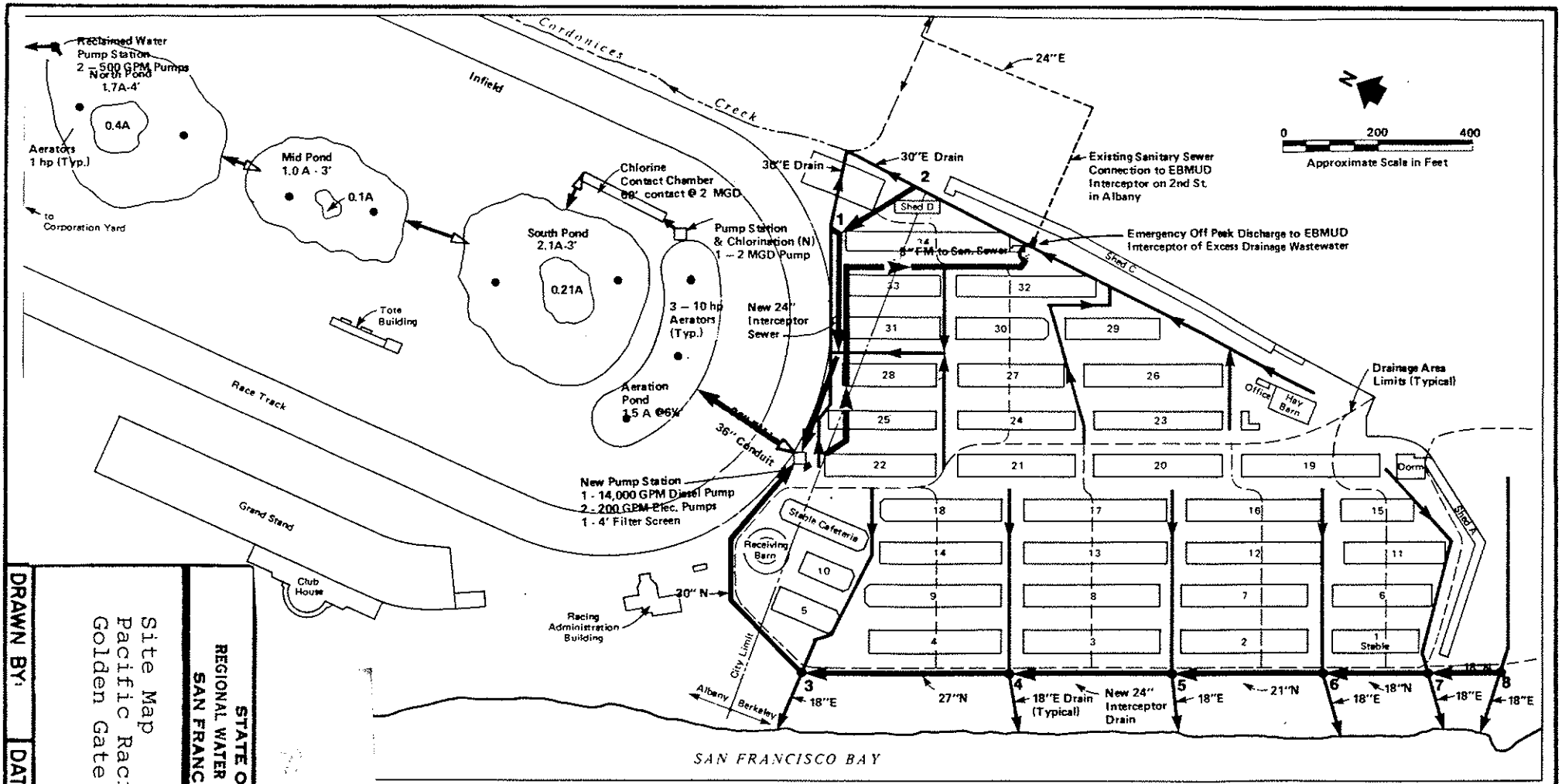
9. The Board will review this Order periodically and may revise the requirements when necessary.

10. The discharger shall assure that a qualified operator is responsible for treatment plant operations pursuant to State regulations (23 CAC Section 3675-3680).

I, Steven R. Ritchie, Executive Officer do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region on May 17, 1989.

Richard K. McMurtry, for
STEVEN R. RITCHIE
Executive Officer

Attachments:
Map
Self-Monitoring Program



PLAN OF
HORSE BARN AREA
DRAINAGE COLLECTION – TREATMENT – DISPOSAL

Legend

E — Existing
N — New
A — Acres
FM — Force Main
Principal Flow Direction
Alternate Flow Direction

Kennedy/Jenks/Chilton

Golden Gate Fields
Stable Area Drainage Collection & Disposal

Alternative 1
Aeration Ponding, Chlorination & Wastewater Reclamation

K/J/C 880096.00
December 1988

Figure 1

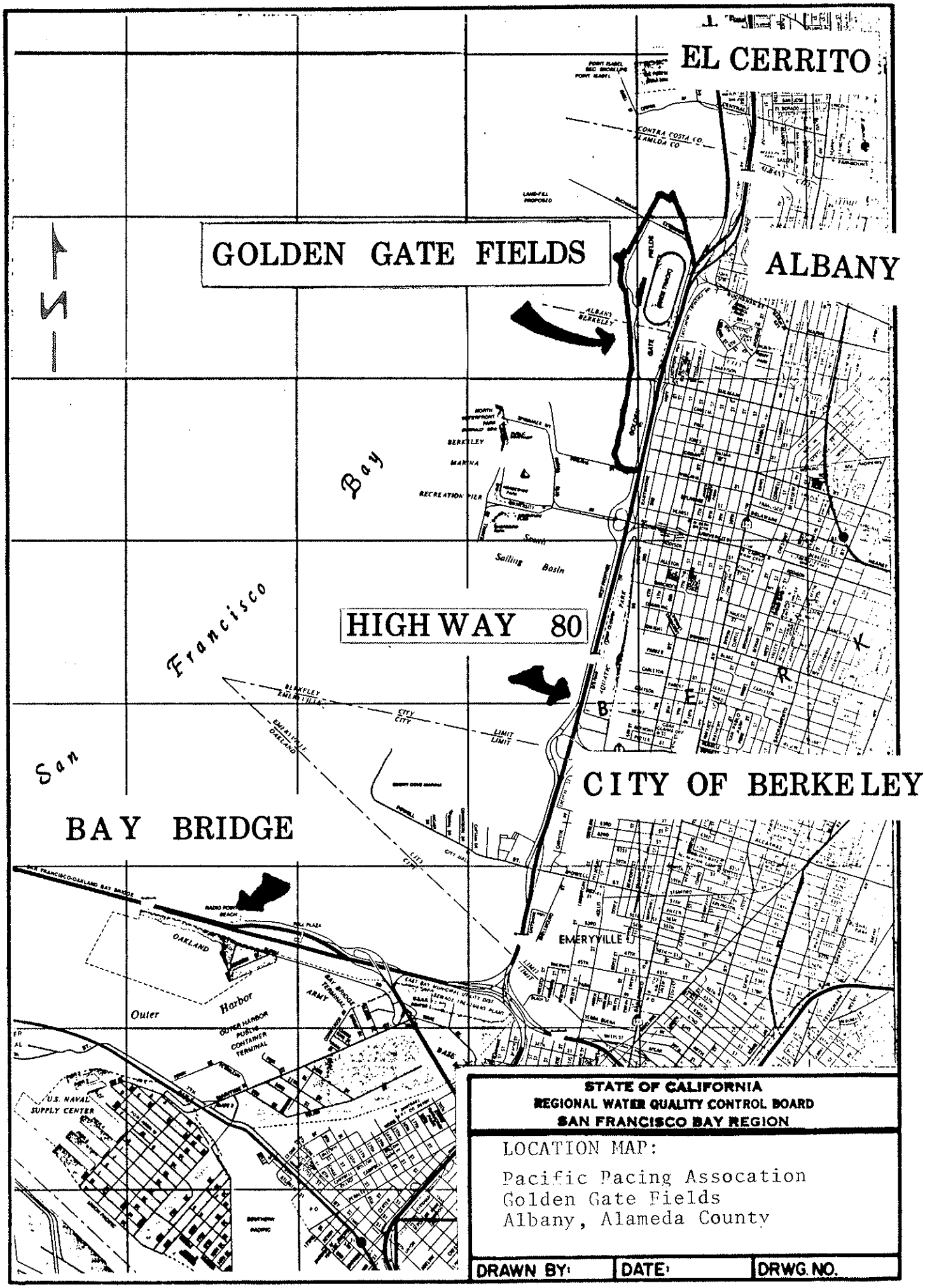
DRAWN BY:

DATE:

DRWG. NO.

Site Map
Pacific Racing Association
Golden Gate Fields

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION



STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

LOCATION MAP:

Pacific Pacing Assocation
Golden Gate Fields
Albany, Alameda County

DRAWN BY:	DATE:	DRWG. NO.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM
FOR

PACIFIC RACING ASSOCIATION AND
SANTA FE FACIFIC REALTY CORPORATION
GOLDEN GATE FIELDS
ALBANY, ALAMEDA COUNTY

ORDER NO. 89-83

I. GENERAL

Reporting responsibilities of waste dischargers are specified in Sections 13225(a), 13267(b), 13268, 13383 and 13387(b) of the California Water Code and this Regional Board's Resolution No. 73-16. The principal purposes of a self monitoring program are:

a. To document compliance with waste discharge requirements prohibitions established by this Regional Board; and

b. To facilitate self-policying by the waste discharger in the prevention and abatement of pollution arising from waste discharge.

II. SAMPLING AND ANALYTICAL METHODS

Sample collection storage, and analyses shall be performed according to the latest edition of **"Standard Methods for the Examination of Water and Wastewater"** prepared and published jointly by the American Public Health Association, American Water Works Association, and Water Pollution Control Federation; or other methods approved and specified by the Executive Officer of this Regional Board.

Water and waste analyses shall be performed by a laboratory approved for these analyses by the State Department of health or a laboratory approved by the Executive Officer. The Director of the laboratory whose name appears on the certification shall supervise all the analytical work in his laboratory and shall sign all reports of such work to the Regional Board.

A grab sample is defined as an individual sample collected in less than 15 minutes.

III. DESCRIPTION OF SAMPLING STATIONS

A. Aeration Pond And Holding Ponds

Stations	Description
P-1 thru P-n	Two stations at each pond, with a distance at least 100 feet a part, at least 5 feet from the pond edge, and no more than 1 foot below the pond surface.

(A sketch showing the locations of these stations should accompany each report.)

B. Effluent

Station	Description
E-1	Located at any point after chlorination and before the holding ponds.

C. Land Observation

Station	Description
L-1 thru L-n	Located along the periphery of the aeration pond no more than 200 feet
R-1 thru R-n	Located along the periphery of the race track and in field where treated wastewater will be used for compaction and irrigation.

(A sketch showing the locations of these stations should accompany each report.)

IV. SCHEDULE OF SAMPLING AND ANALYSES

a. The discharger is required to perform sampling, and analyses according to the schedule give in Table 1.

VI. REPORTS TO BE FILED WITH THE BOARD

A. Violation of Requirements

In the event the discharger is unable to comply with the conditions of the water reclamation requirement and prohibitions due to:

1. maintenance work, power failure, or breakdown of waste treatment facilities,

2. accidents caused by human error or negligence, or

3. other causes such as acts of nature.

the discharger shall notify the Regional Board office by telephone as soon as he or his agents have knowledge of the incident and confirm this notification in writing within two weeks of the telephone notification. The written report shall include pertinent information explaining reasons for the non-compliance and shall indicate what steps were taken to prevent the problems from recurring.

within two weeks of the telephone notification. The written report shall include pertinent information explaining reasons for the non-compliance and shall indicate what steps were taken to prevent the problems from recurring.

B. Self-Monitoring Reports

Written report by the discharger shall be filed regularly for each calendar month by the 15th day of he following month. The reports will be comprised of the following:

1. Letter of Transmittal

A Letter transmitting self-monitoring report shall accompany each report. Such a letter shall include a discussion of requirement violations found during the past month and actions taken or planned for correcting the violation such as operations modifications, and/or facilities expansion. If the discharger has previously submitted a time schedule for correcting requirement violations, a reference to the correspondence transmitting such a schedule will be satisfactory.

The letter shall contain a statement by the official, under penalty of perjury, that to the best of the signer's knowledge the report is true and correct.

2. Results of Analyses and Observations

Tabulation of the results from such required analyses and/or observations specified in Table 1 by date, time, type of sample, and station.

3. List of Approved Analyses

a. List the analyses for which the Producer is approved by the State Department of Health.

b. List of analyses performed for the discharger by another approved laboratory. Copies of reports signed by the laboratory director shall also be submitted as part of the self monitoring report.

I, Steven R. Ritchie, Executive Officer, herely certify that the forgoing Self-Monitoring Program:

1. Has been developed in accordance with the procedure set forth in this Regional Board's Resolution No. 73-16 in order to obtain data and document compliance with water reclamation requirements established in Order No. 89-83

2. Is effective on the date shown below.

3. May be reviewed at any time subsequent to the effective date upon written notice from either the Executive Officer or the discharger, and will be revised upon written agreement of the Executive Officer and the discharger.

Richard K. McMurtry, for

STEVEN R. RITCHIE
Executive Officer

Effective Date May 17, 1989

Attachment:
Table I

TABLE I
SCHEDULE FOR SAMPLING, MEASUREMENTS AND ANALYSIS
GOLDEN GATE FIELD

Sampling Station	P-1 thru P-n	E-1	L-1 thru Ln	R1 to Rn
Type of Sample	G	G	O	O
Flow Rate		D		
BOD, 5 day		M		
Chlorine Residual (mg/l)		3/W		
Settleable Matter(ml/l hr.)		D		
Total Suspended Matter,mg/l		M		
Oil and Grease, mg/l		Q		
Coliform, Total MPN/100 ml		3/W		
Ammonia Nitrogen (mg/l)		Q		
Nitrate Nitrogen, mg/l		Q		
Total Organic Nitrogen,mg/l		Q		
Total Phosphate (mg/l)		Q		
pH (unit)	W/M(3)	W		
Dissolved Oxygen,mg/l	W/M(3)	W		
Temperature (%C)	W/M(3)			
Sulfides (if DO <1.0 mg/l) Total & Dissolved (mg/l)	W/M(3)	W		
All Applicable Standard Observation			(2) W	(1)W

(1) Observe and report on evidence of reclaimed water used for irrigation escaping from spray disposal area via (1) surface flow, (2) resurfacing after percolation and/or (3) air borne spray. Applies only to periods when reclamation occurs.
(2) Observe levees for evidence of Seepage, levee integrity, and emergent vegatiion, and freeboard.

(3) Frequency may be reduced to monthly (April thru September) and quarterly (October thru March) by the Excutive Officer after one full year of operation.

LEGEND

Type of Sample

G= grab sample
O= observation

Frequency of Sampling

D = daily
W = weekly
Q = quarterly
3/W= 3 days per week
W/M= Weekly Between May to September and Monthly Bewteen October to April